

ESTTA Tracking number: **ESTTA748078**

Filing date: **05/23/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221170
Party	Defendant RSM Consulting
Correspondence Address	Natalie G. Furman PAUL HASTINGS LLP 200 Park Avenue NEW YORK, NY 10166 UNITED STATES rls@paulhastings.com,nataliefurman@paulhastings.com,andrewgrossman@paulhastings.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Natalie G. Furman
Filer's e-mail	nataliefurman@paulhastings.com
Signature	/Natalie G. Furman/
Date	05/23/2016
Attachments	Consent Motion to Extend Time to Answer.pdf(102523 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Serial No. 86/273,073  
Published in the Official Gazette on October 1, 2014  
For the Mark: RSM GLOBAL (stylized/design)

RSM International Association,	)	
	)	
	)	
v.	)	Opposition No. 91221170
	)	
RSM Consulting,	)	
	)	
Applicant.	)	
	)	

**Motion To Extend Time to Answer**

Pursuant to Trademark Trial and Appeal Board Manual of Procedure (“TBMP”) §§ 310.03(c) and 509 and Rule 6(b) of the Federal Rules of Civil Procedure, Applicant RSM Consulting (“Applicant”), with the consent of Opposer RSM International Association (“Opposer”), hereby requests that the Trademark Trial and Appeal Board (the “Board”) extend Applicant’s time to answer by thirty (30) days so that the parties can continue to pursue settlement negotiations.

The Defendant’s Time to Answer is currently set to close on 05/23/2016. The parties request that such date be extended for 30 days, or until 06/22/2016, to complete execution of an agreement to settle the opposition, and that all subsequent dates be reset accordingly. The parties have engaged in settlement discussions and have communicated through counsel by telephone and email up to and including 05/23/2016. All issues have been resolved and the parties are in the process of executing an agreement to settle the matter. Given the distance and the time differences involved, time is needed to complete the relevant documents and signatures. Accordingly, Applicant requests that the Board extend the time to answer for thirty (30) days and reset subsequent dates as follows:

Time to Answer :	06/22/2016
Deadline for Discovery Conference :	07/22/2016
Discovery Opens :	07/22/2016
Initial Disclosures Due :	08/21/2016
Expert Disclosures Due :	12/19/2016
Discovery Period to Close :	01/18/2017
Plaintiff Pretrial Disclosures :	03/04/2017
Plaintiff's 30-day Trial Period Ends :	04/18/2017
Defendant's Pretrial Disclosures :	05/03/2017
Defendant's 30-day Trial Period ends :	06/17/2017
Plaintiff's Rebuttal Disclosures :	07/02/2017
Plaintiff's 15-day Rebuttal Period Ends :	08/01/2017

Applicant has obtained consent of Opposer prior to filing this motion. This motion is made in good faith, without any intent to cause delay or prejudice, and with the sole purpose of allowing the parties time to reach a settlement. Applicant has provided an email address herewith for itself, and notes the opposing party's email address of record of sbenson@mdslaw.com, so that any order on this motion may be issued electronically by the Board.

Dated: May 23, 2016

By: /s/ Natalie G. Furman  
 Natalie G. Furman, Esq.  
 PAUL HASTINGS LLP  
 200 Park Avenue  
 New York, New York 10166  
 212-318-6000  
 rls@paulhastings.com  
 nataliefurman@paulhastings.com

*Attorneys for Applicant*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Motion To Extend Time to Answer was served by Applicant this 23rd day of May, 2016 by delivering a true and correct copy of same by First Class Mail to:

Stuart Benson  
Manelli Selter PLLC  
2000 M Street, NW 7th Floor  
Washington, DC 20036

  
\_\_\_\_\_  
Rosetta Kromer